REMARKS

The Applicant respectfully requests further examination and reconsideration in view of the arguments set forth fully below. Claims 1-51 were previously pending in this application. Within the Office Action, Claims 1-51 have been rejected. By the above amendment, Claims 1, 13, 25, 37, 47, 49 and 51 have been amended and Claims 4, 5, 16, 17, 28, 29, 40 and 41 have been canceled. Accordingly, Claims 1-3, 6-15, 18-27, 30-39 and 42-51 are currently pending in this application.

Rejections under 35 U.S.C. §103

Within the Office Action, Claims 1-51 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,253,188 issued to Witek et al. (hereafter "Witek") in view of U.S. Patent No. 6,094,652 issued to Mohammad Faisal (hereafter "Faisal").

Witek teaches a system and method for providing classified ads over the Internet. Internet users can connect to a newspaper web server and central web application server to search for and obtain classified ads. Ad records are stored in ad database servers 20 for providing classified ad records on request to application servers 16. To search the ad records, the search process is divided into two principle parts. The first part includes a system entry and pre-selection sequence, and the second part includes a record selection sequence. [Witek, col. 12, lines 10-13] More specifically, in the first part the user enters the system and specifies the category of classified ads to be searched. Thereafter, as the user navigates to the respective selected category, the user further specifies a subcategory for the particular category selected. [Witek, col. 12, lines 27-37] The selected category and subcategory pair is identified by a category/subcategory ID 46. The specific parameters are entered as primary selection parameters 60 and as secondary selection parameters 62. The first part of the search process is limited to performing searches based on category, or in other words a hierarchical search. [Witek, col. 13, lines 30-46] During this first *utilization* of the search system of Witek, the user is *only* able to specify a category and subcategory pair. The second part of the search process is limited to performing searches based on entered parameters, in other words keyword search or parametric search. During this second *utilization* of the search system of Witek, the user is *only* able to perform searches based on entered parameters.

As discussed above, Witek teaches that the user first navigates through the system and specifies a category and subcategory to narrow down the number of records to search. [Witek, col. 12, lines 27-37] According to the teachings of Witek, during this first part of the search process, only the category and subcategory search methodologies are available. Witek then teaches that the second part of the search process includes entering a formal record selection query containing the specific parameters for the ad records the user wishes to see. [Witek, col. 17, lines 42-50] No other search methodologies are available during the second part of the search process. Witek does not teach that during the first part or the second part of the search process, each of the search methodologies are available. Accordingly, Witek does not teach that each utilization of the search module includes the availability of all types of available searches.

Witek does not teach a dichotomous key search. Further, Witek does not teach performing a search in which for any given searching step, at any location within the database, four different search methodologies are available to be used to perform the search. Specifically, Witek does not teach that any of a keyword search, hierarchical search, dichotomous key search and parametric search can be used at any location within the database. As discussed above, Witek teaches that during the first part of the search process only the category and subcategory are specified and during the second part of the search process only searches based on entered parameters are available.

Faisal teaches hierarchical query feedback in an information retrieval system. Faisal does not teach a dichotomous key search. Further, Faisal does not teach performing a search in which for any given searching step, at any location within the database, four different search methodologies are available to be used to perform the search. Specifically, Faisal does not teach that any of a keyword search, hierarchical search, dichotomous key search and parametric search can be used at any location within the database.

As described above, neither Witek, Faisal nor their combination teach a dichotomous key search. Further, neither Witek, Faisal nor their combination teach performing a search in which for any given searching step, at any location within the database, four different search methodologies are available to be used to perform the search. Specifically, neither Witek, Faisal nor their combination teach that any of a keyword search, hierarchical search, dichotomous key search and parametric search can be used at any location within the database.

In contrast to the teachings of Witek and Faisal, the method of and apparatus for organizing data of the present invention, interchangeably utilizes a multitude of search methodologies. Specifically, utilizing a search module, a user is able to selectively utilize one or

more search methodologies including keyword search, hierarchical search, dichotomous key search and parametric search at any node within the directory structure to correlate a search criteria to a searchable database for generating one or more matching items. It is further taught within the present specification that

> [a]t each node within the tree, the user is presented with the option of using any one or combinations of the four search methodologies utilized by the research system. The four search methodologies are keyword search, hierarchical tree search, dichotomous key search, and parametric search. Regardless as to which search methodology or search methodologies are used to reach a particular node, the user can utilize any of the four search methodologies to further refine the search and move further down the directory tree structure. The user may also navigate back up the directory tree structure to a higher node, and once again have the option to use any of the four search methodologies to refine the search from the current node and move further down the directory tree structure. [Present Specification, page 40, lines 14-23].

Therefore, a user is able to navigate the directory tree structure, utilizing any one of the four search methodologies in any combination to reach the desired result. As discussed above, neither Witek, Faisal nor their combination teach that each utilization of the search module at any node within the directory tree structure includes the availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search.

The independent Claim 1 is directed to a method of organizing data within a searchable database. The method of Claim 1 comprises the steps of generating a directory tree structure, wherein the directory tree structure includes nodes and branches comprising a designated category for each node and branches comprising links between the nodes, generating one or more data pointers, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding pointers of the specific node are related to the designated category of the specific node, generating one or more node pointers, wherein a first node pointer corresponds to a first node located in a first navigation path through the directory tree structure, and the first node pointer is directed to a second node located in a second navigation path different than the

first navigation path, thereby forming a cross-link between two nodes located in two different navigation paths and navigating the directory tree structure and selecting a corresponding data pointer to access a particular item of data within the searchable database utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search, wherein each utilization of the search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. As discussed above, neither Witek, Faisal nor their combination teach navigating a directory tree structure utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search. Further, neither Witek, Faisal nor their combination teach that each utilization of a search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. For at least these reasons, the independent Claim 1 is allowable over the teachings of Witek, Faisal, and their combination.

Claims 4 and 5 have been canceled by the above amendment. Claims 2, 3 and 6-12 are all dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Witek, Faisal, and their combination. Accordingly, Claims 2, 3 and 6-12 are all also allowable as being dependent on an allowable base claim.

The independent Claim 13 is directed to an organization system for organizing data within a searchable database. The organization system of Claim 13 comprises means for generating a directory tree structure, wherein the directory tree structure includes nodes and branches comprising a designated category for each node and branches comprising links between the nodes, means for generating one or more data pointers coupled to the means for generating a directory tree structure, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding data pointers of the specific node are related to the designated category of the specific node, means for generating one or more node pointers, wherein a first node pointer corresponds to a first node located in a first navigation path through the directory tree structure, and the first node pointer is directed to a second node located in a second navigation path

different than the first navigation path, thereby forming a cross-link between two nodes located in two different navigation paths and means for navigating the directory tree structure and selecting a corresponding data pointer to access a particular item of data within the searchable database utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search, wherein each utilization of the search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. As discussed above, neither Witek, Faisal nor their combination teach navigating a directory tree structure utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search. Further, neither Witek, Faisal nor their combination teach that each utilization of a search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. For at least these reasons, the independent Claim 13 is allowable over the teachings of Witek, Faisal, and their combination.

By the above amendment, Claims 16 and 17 have been canceled. Claims 14, 15 and 18-24 are all dependent on the independent Claim 13. As described above, the independent Claim 13 is allowable over the teachings of Witek, Faisal, and their combination. Accordingly, Claims 14, 15 and 18-24 are all also allowable as being dependent on an allowable base claim.

The independent Claim 25 is directed to an organization system for organizing data within a searchable database. The organization system of Claim 25 comprises an organization server configured to generate a directory tree structure, wherein the directory tree structure includes nodes and branches comprising a designated category for each node and branches comprising links between the nodes, and to generate one or more data pointers, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding data pointers of the specific node are related to the designated category of the specific node and to generate one or more node pointers, wherein a first node pointer corresponds to a first node located in a first navigation path through the directory tree structure, and the first node pointer is directed to a second node located in a second navigation path different than the first navigation path, thereby

forming a cross-link between two nodes located in two different navigation paths. It is further specified in Claim 25 that the organization server is utilized by a user to navigate the directory tree structure and to select a corresponding data pointer to access a particular item of data within the searchable database, and further wherein the directory tree structure is navigated utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search, wherein each utilization of the search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. As discussed above, neither Witek, Faisal nor their combination teach navigating a directory tree structure utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search. Further, neither Witek, Faisal nor their combination teach that each utilization of a search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. For at least these reasons, the independent Claim 25 is allowable over the teachings of Witek, Faisal, and their combination.

By the above amendment, Claims 28 and 29 have been canceled. Claims 26, 27 and 30-36 are all dependent on the independent Claim 25. As described above, the independent Claim 25 is allowable over the teachings of Witek, Faisal, and their combination. Accordingly, Claims 26, 27 and 30-36 are all also allowable as being dependent on an allowable base claim.

The independent Claim 37 is directed to a network of devices for organizing data within a searchable database. The network of devices of Claim 37 comprises one or more computer systems configured to communicate with other systems, and an organization server configured to couple to the one or more computer systems to generate a directory tree structure, wherein the directory tree structure includes nodes and branches comprising a designated category for each node and branches comprising links between the nodes, and to generate one or more data pointers, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding data pointers of the specific node are related to the designated category of the specific node and to generate one or more node pointers, wherein a first node pointer

corresponds to a first node located in a first navigation path through the directory tree structure, and the first node pointer is directed to a second node located in a second navigation path different than the first navigation path, thereby forming a cross-link between two nodes located in two different navigation paths. It is further specified in Claim 37 that the organization server is utilized by a user to navigate the directory tree structure and to select a corresponding data pointer to access a particular item of data within the searchable database, and further wherein the directory tree structure is navigated utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search, wherein each utilization of the search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. As discussed above, neither Witek, Faisal nor their combination teach navigating a directory tree structure utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search. Further, neither Witek, Faisal nor their combination teach that each utilization of a search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. For at least these reasons, the independent Claim 37 is allowable over the teachings of Witek, Faisal, and their combination.

By the above amendment, Claims 40 and 41 have been canceled. Claims 38, 39 and 42-46 are all dependent on the independent Claim 37. As described above, the independent Claim 37 is allowable over the teachings of Witek, Faisal, and their combination. Accordingly, Claims 38, 39 and 42-46 are all also allowable as being dependent on an allowable base claim.

The independent Claim 47 is directed to a method of organizing data within a searchable database. The method of Claim 47 comprises generating a directory tree structure, wherein the directory tree structure includes nodes and branches comprising a designated category and an html address for each node and branches comprising links between the nodes, generating one or more pointers, wherein each pointer corresponds to a specific node and the pointer links the specific node to an item of web-based multimedia within the searchable database, wherein each pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual web-based multimedia item thereby forming a set parameter, and the parameters are specific to the node in which the pointer is included, further wherein all items of web-based multimedia linked to the specific node by the corresponding pointers of the specific node are related to the designated category of the specific node and navigating the directory tree structure

and selecting a corresponding pointer to access a particular item of data within the searchable database utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search, wherein each utilization of the search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. As discussed above, neither Witek, Faisal nor their combination teach navigating a directory tree structure utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search. Further, neither Witek, Faisal nor their combination teach that each utilization of a search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. For at least these reasons, the independent Claim 47 is allowable over the teachings of Witek, Faisal, and their combination.

Claim 48 is dependent on the independent Claim 47. As described above, the independent Claim 47 is allowable over the teachings of Witek, Faisal, and their combination. Accordingly, Claim 48 is also allowable as being dependent on an allowable base claim.

The independent Claim 49 is directed to a method of generating a directory tree structure for organizing data within a searchable database and for accessing the searchable database over the internet. The method of claim 49 comprises the steps of generating one or more nodes wherein.each node includes an html address and a designated category, generating links between the nodes wherein each node is linked to at least one other node, further wherein each link is a hypertext link between a first html address of a first node and a second html address of a second node, generating one or more pointers, wherein each pointer corresponds to a specific node and the pointer links the specific node to an item of web-based multimedia within the searchable database, wherein each pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual web-based multimedia item thereby forming a set parameter, and the parameters are specific to the node in which the pointer is included, further wherein all items of web-based multimedia linked to the specific node by the corresponding pointers of the specific node are related to the designated category of the specific node, establishing a connection over the internet to the directory tree structure for accessing the searchable database and navigating the directory tree structure and selecting a corresponding pointer to access a particular item of data within the searchable database utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search, wherein

each utilization of the search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. As discussed above, neither Witek, Faisal nor their combination teach navigating a directory tree structure utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search. Further, neither Witek, Faisal nor their combination teach that each utilization of a search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. For at least these reasons, the independent Claim 49 is allowable over the teachings of Witek, Faisal, and their combination.

Claim 50 is dependent on the independent Claim 49. As described above, the independent Claim 49 is allowable over the teachings of Witek, Faisal, and their combination. Accordingly, Claim 50 is also allowable as being dependent on an allowable base claim.

The independent Claim 51 is directed to a method of organizing data within a searchable database. The method of Claim 51 includes generating a directory tree structure, wherein the directory tree structure includes nodes and branches comprising a designated category for each node and branches comprising links between the nodes, generating one or more data pointers, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding pointers of the specific node are related to the designated category of the specific node, generating one or more node pointers, wherein a node pointer is different than a data pointer, further wherein each node pointer defines a cross-link between a first node located in a first navigation path and a second node located in a second navigation path and navigating the directory tree structure and selecting a corresponding data pointer to access a particular item of data within the searchable database utilizing a search module including keyword search, hierarchical search, dichotomous key search and parametric search, wherein each utilization of the search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. As discussed above, neither Witek, Faisal nor their combination teach navigating a directory tree structure utilizing a search module including keyword search, hierarchical search, dichotomous

key search and parametric search. Further, neither Witek, Faisal nor their combination teach that each utilization of a search module at any node within the directory tree structure includes availability of the keyword search, the hierarchical search, the dichotomous key search and the parametric search. For at least these reasons, the independent Claim 51 is allowable over the teachings of Witek, Faisal, and their combination.

For the reasons given above, Applicant respectfully submits that Claims 1-3, 6-15, 18-27, 30-39 and 42-51 are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, he/she is encouraged to call the undersigned attorney at (408) 530-9700.

Respectfully submitted,
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CERTIFICATE OF MAILING (37 CFR§ 1.8(a))

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